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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

-----X	
Nilda GUTIERREZ, Linda MORGAN,	:
Wayne BROWN and Krista MARSHALL,	:
	: PLAINTIFFS' RENEWED
Individually and as	: MOTION FOR
Class Representatives,	: CLASS CERTIFICATION
	:
Plaintiffs,	:
	: Civil Action No. 01-5302
v.	:
	: Filed Electronically
JOHNSON & JOHNSON,	:
	:
Defendant.	:
-----X	

PLEASE TAKE NOTICE that Plaintiffs Nilda Gutierrez, Linda Morgan, Wayne Brown and Krista Marshall move, pursuant to Rule 23 of the Federal Rules of Civil Procedure,

(1) to certify the following class:

All African American and Hispanic persons employed in the United States by Johnson & Johnson (hereafter “J&J”) in any regular, exempt salaried position below hierarchy code F (“Management Board”) in EEO-1 job categories “Officials and Managers” and “Professionals,” at any time from November 15, 1997 to the present;

(2) to approve the four named Plaintiffs as class representatives; and

(3) to appoint Plaintiffs’ counsel as Class Counsel.

The Motion is returnable on September 8, 2009, or at such other time that may be set by the Court.

Certification is appropriate because Plaintiffs’ proposed class meets all the requirements of Rule 23(a) as well as the standards established by Rule 23(b)(2). Furthermore, Defendant has established and maintained excessively subjective human resources policies and practices adopted by senior management and applicable throughout the Company. The deleterious impact of Defendant’s use of excess subjectivity in compensation, performance management and promotion systems is demonstrated by statistically significant shortfalls in career development and compensation for putative class members, the Report of Dr. Richard Martell, as well as through the experiences of Plaintiffs.

Plaintiffs are adequate representatives of the proposed class because they have all been active in this litigation, their claims are typical of the class, and each has no interest antagonistic to those of the class. Furthermore, Plaintiffs' counsel—the law firms of Mehri & Skalet, PLLC, Seeger Weiss, LLP, Henderson Law Firm, PLLC, Sprenger & Lang, PLLC, and Bennet D. Zurofsky, Esq.—are substantially experienced in the area of Title VII and employment-related class litigation and will adequately represent the class and, therefore, should be appointed as Class Counsel pursuant to Fed. R. Civ. P. 23(g)

PLEASE TAKE FURTHER NOTICE that the attached Plaintiffs' Memorandum in Support of Renewed Motion for Class Certification sets forth, in full, the grounds for this Motion.

These Plaintiffs further respectfully request that the Court hold an evidentiary hearing on their Motion.

DATED: July 31, 2009

s/ Scott Alan George
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